

**COURT'S PROPOSED VERDICT FORM**

We, the jury, unanimously find:

**SPECIAL FINDINGS**

1. Did Plaintiff prove by a preponderance of the evidence that Officer Johnston shot her in the eye and chest?

Yes X No \_\_\_\_\_

*If you answered yes to Question 1, proceed to Question 2.*

*If you answered no to Question 1, your deliberations are complete. Proceed to the end of the form and have the foreperson sign and date the form. Do not answer the remaining Questions.*

2. Did Plaintiff prove by a preponderance of the evidence that Officer Johnston targeted her?

Yes \_\_\_\_\_ No X

*Proceed to Question 3.*

**CLAIM 1**

**First Amendment Claim Against Officer Robert Johnston**

3. Did Plaintiff prove by a preponderance of the evidence that Officer Johnston violated her First Amendment right to speech or lawful assembly?

Yes \_\_\_\_\_ No X

*Proceed to Question 4.*

**CLAIM 2**

**Fourth Amendment Claim Against Officer Robert Johnston**

4. Did Plaintiff prove by a preponderance of the evidence that Officer Johnston violated her Fourth Amendment right not to be subjected to excessive force?

Yes X No \_\_\_\_\_

*Proceed to Question 5.*

**CLAIM 3**  
**Battery Claim Against City of Salem**

5. Did Plaintiff prove by a preponderance of the evidence that Officer Johnston committed Battery against Plaintiff?

Yes \_\_\_\_\_ No X \_\_\_\_\_

*If you answered yes to Questions 3, 4, or 5, proceed to Question 6.*

*If you answered no to Questions 3, 4, and 5, your deliberations are complete. Proceed to the end of the form and have the foreperson sign and date the form. Do not answer the remaining Questions.*

**Damages**

6. What amount, if any, of economic loss did Plaintiff prove by a preponderance of the evidence was caused by Officer Johnston's actions?

\$ 250,000

7. What amount, if any, of non-economic damages did Plaintiff prove by a preponderance of the evidence was caused by Officer Johnston's actions?

\$ 800,000

**You have completed your consideration of Plaintiff's claims. Please have the Presiding Juror sign and date the verdict.**

09/30/2022  
DATE

~~PRESIDING JUROR~~